

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

**MILEYDIS SANCHEZ,**

**CASE NO. 0:25-CV-60980-DMM**

Plaintiff,

v.

**DEVELOPMENTAL THERAPIES AND  
BEYOND LLC AND JUSED MELIAN,**

Defendants.

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**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO COMPLAINT [ECF 1]**

Defendants DEVELOPMENTAL THERAPIES AND BEYOND LLC (“DTB”) and JUSED MELIAN (“Ms. Melian”) (hereinafter collectively the “Defendants”), by and through undersigned counsel, and pursuant to Fed. R. Civ. P. 6(b) and S.D. Fla. L.R. 7.1, file this unopposed request for extension of time within which to serve their response to the Complaint in this action and state as follows:

1. The Complaint (“Complaint”) was served on the Defendants on May 28, 2025.
2. Accordingly, Defendants’ response to the Complaint is due on Tuesday, June 17, 2025.
3. Undersigned counsel was only recently retained and, together with the Defendants, is still gathering the necessary information to properly respond to the Complaint.
4. Federal Rule of Procedure 6(b) permits the Court, for good cause, to grant extensions of time “upon written motion... before the original time... expires.” *See*, Fed. R. Civ. Pro. 6(b)(1)(A).

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5. Due to the imminent deadline and the nature of Plaintiff's claims, Defendants request the Court grant an extension of the response deadline to review and investigate Plaintiff's claims and prepare an appropriate response to Plaintiff's Complaint.

6. The parties have also been engaging in initial discussions attempting to resolve the case, and counsel for the Plaintiff has confirmed his consent to a twenty (20) day extension of time to respond to the Complaint.

7. Defendants therefore request an extension to Monday, July 7, 2025, to file their Response to the Complaint.

8. Defendants do not seek this extension of time for the purpose of creating undue delay or prejudice. No party will be prejudiced by the requested extension of time to respond to the Complaint.

WHEREFORE, Defendants DEVELOPMENTAL THERAPIES AND BEYOND LLC and JUSED MELIAN respectfully request that the Court grant this Unopposed Motion for Extension of Time and enter the Order extending the deadline to respond to the Complaint through and including July 7, 2025.

Respectfully submitted,

**LAW OFFICE OF ALEXIS GONZALEZ, P.A.**

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/s/ Alejandro Hoyos

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been filed with the Clerk of Court using the CM/ECF system on this 16<sup>th</sup> day of June, 2025. I also certify that the foregoing was served on this day by electronic mail via the CM/ECF system to the following:

FAIRLAW FIRM Brian H. Pollock, Esq. 135 San Lorenzo Avenue Suite 770 Email: <a href="mailto:brian@fairlawattorney.com">brian@fairlawattorney.com</a> <i>Counsel for Plaintiff</i>	
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/s/ Alejandro Hoyos  
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